

ELLEN F. ROSENBLUM  
Attorney General  
SHANNON M. VINCENT #054700  
Senior Assistant Attorney General  
KENNETH C. CROWLEY #883554  
Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096  
Telephone: (503) 947-4700  
Fax: (503) 947-4791  
Email: Shannon.M.Vincent@doj.state.or.us  
Kenneth.C.Crowley@doj.state.or.us

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

MARK WILSON,

Plaintiff,

v.

JERRY PLANTE, RONNIE FOSS, CRAIG  
PRINS, JOSH HIGHBERGER, MELISSA  
NOFZIGER, COLLETTE PETERS, MARIA  
D. GARCIA, and JOHN DOES 1-10,

Defendants.

Case No. 6:21-cv-01606-SI

DECLARATION OF SHANNON VINCENT  
IN SUPPORT OF DEFENDANTS' MOTION  
TO EXTEND TIME (FIRST)

I, Shannon Vincent, hereby declare:

1. I am an attorney licensed to practice law in the State of Oregon and am a Senior Assistant Attorney General for the State of Oregon.
2. I am one of the attorneys assigned to represent the defendants in the above-captioned case and have personal knowledge of the matters set forth herein.

3. On July 7, 2022, the Court entered an order denying defendants' partial motion to dismiss plaintiff's Second Amended Complaint. According to defendants' calculations, under FRCP 15(a)(3), their answer to plaintiff's Second Amended Complaint is currently due **July 21, 2022**.

4. Over the course of the last two weeks, I was assigned to a state habeas matter that required immediate work due to a pending show cause order. Due to my other intervening time-intensive, time-sensitive work, I have not had sufficient time to prepare defendants' answer to all of the allegations in plaintiff's Second Amended Complaint.

5. Accordingly, defendants are requesting a one-week extension of time—through **July 28, 2022**—within which to file their answer.

6. This request is made in good faith and not for the purposes of delay.

**I declare under penalty of perjury that the foregoing is true and correct.**

EXECUTED on July 21, 2022.

s/ Shannon M. Vincent  
SHANNON M. VINCENT  
Senior Assistant Attorney General